

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

UNITED STATES OF AMERICA

v.

Criminal No. 2:20-00054

NEDELTCCHO VLADIMIROV

MOTION TO CONTINUE TRIAL AND ALL CASE RELATED ACTION

The defendant, Nedeltcho Vladimirov, by his attorney, Assistant Federal Public Defender Rachel E. Zimarowski, respectfully moves this Court to continue the trial and all case related action in this matter for a period of sixty (60) days. In support thereof, counsel respectfully represents:

1. By Order entered on March 16, 2020, the deadline for the filing of pretrial motions was scheduled for today, April 13, 2020; the pretrial motions hearing was scheduled for April 20, 2020, at 11:00 a.m.; and, the trial was scheduled to commence on May 11, 2020, at 9:00 a.m. before United States District Court Judge Irene C. Berger in Charleston. Dkt. No. 30.

2. The government's standard discovery responses have been received and are voluminous. Due to the exigent circumstances of the COVID-19 pandemic, the undersigned's ability to both consult with Mr. Vladimirov and conduct necessary investigation into his case have been severely circumscribed. The undersigned requires additional time to complete these tasks prior to determining what, if any, pretrial motions to file on Mr. Vladimirov's behalf.

3. Further, as Mr. Vladimirov's first and primary language is Bulgarian, it has been difficult for the undersigned to effectively consult with him by remote

means. The undersigned is exploring options for improving such consultations, such as retaining an interpreter.

4. Governor Jim Justice issued a statewide stay-at-home order on March 24, 2020, that remains effective until rescinded. Under General Order No. 3, the court itself is effectively closed until April 24, 2020. A continuance of the trial and pretrial deadlines for a period of sixty (60) days is necessary in light of the current circumstances.

5. The undersigned has conferred with Assistant United States Attorney Andrew Tessman and is authorized to state that he does not oppose the requested continuance.

The defendant certifies that the reasons for the request do not include general congestion of the Court's calendar or lack of diligent preparation on the part of the parties involved.

WHEREFORE, for the above-stated reasons, the defendant respectfully requests this Honorable Court enter an order continuing the trial and all case related action in this matter for a period of sixty (60) days.

Date: April 13, 2020.

Respectfully submitted,

NEDELTCHO VLADIMIROV

By Counsel

**WESLEY P. PAGE
FEDERAL PUBLIC DEFENDER**

s/Rachel E. Zimarowski

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